

**REMARKS**

Claims 1-23 are pending. Claims 1, 2, 5-7, 9-15, 18, 20, 21, and 23 have been amended. New claims 24-28 have been added, support for which can be found throughout the specification. Applicants respectfully request reconsideration of the application in response to the non-final Office Action.

**Objections to the Drawings**

The drawings are objected to as failing to comply with 37 C.F.R. §1.84(p)(5) because FIGS. 2 and 3 include reference characters not mentioned in the description. Applicants have amended the specification to add the reference characters in the description in compliance with 37 C.F.R. §1.121(b). Accordingly, Applicants respectfully request that the objection to the drawings be withdrawn.

**Claim Rejections Under 35 U.S.C. §102**

Claims 1, 16, and 18 have been rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent Application Publication No. 2003/0031260 to Tabatabai *et al.* ("Tabatabai"). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 1, as amended, recites "making an extensible markup language (XML) schema that defines at least a compression node describing object data to be compressed, and parameters used for data compression; making style sheets which support conversion of an input XML file into a file, which is to be input to a data compression encoder, based on the XML schema; and generating the file, which is

to be input to the data compression encoder, by parsing the input XML file based on the XML schema and the style sheets."

Tabatabai describes transcoding between multimedia content data and multimedia description data. (Tabatabai at Abstract). Multimedia content data (typically represented in MPEG-4 format) defines how to represent coded multimedia content, such as the spatial and temporal layout of media resources, but Tabatabai explains that it is difficult to search multimedia content data to locate particular content of interest. (Tabatabai at paragraph [0008]). Multimedia description data (typically represented in MPEG-7 format), on the other hand, defines how to describe multimedia content data. Tabatabai explains that multimedia description data can be used to search, filter and/or browse the multimedia content data to locate particular content of interest. (Tabatabai at paragraphs [0008] and [0015]).

Tabatabai further describes transcoding from multimedia content data to multimedia description data via rules stored in an Extensible Stylesheet Transformation (XSLT) format. (Tabatabai at paragraph [0017] and [0030]). In particular, Tabatabai describes encoding the content description data in an "instance document" that references an appropriate schema, and using the content description data contained in the instance document to search, filter and/or browse a corresponding content data stream. (Tabatabai at paragraphs [0014] and [0015]). For example, Tabatabai shows an example content data file (in SMIL/XMT-Ω format) in FIG. 4A, a corresponding transcoded description data file (in MPEG-7 format) in FIG. 4B, and an example portion of an XSLT stylesheet in FIG. 8, but Tabatabai does not appear to show or describe an XML schema defining at least a

compression node that describes object data to be compressed and parameters used for data compression. (Tabatabai at paragraphs [0041] and [0060]).

At most, Tabatabai describes that the "instance document" of encoded description data references an appropriate schema and contains descriptor values for the required elements and attributes defined in the schema. (Tabatabai at paragraphs [0012] – [0014]). Nowhere does Tabatabai describe, however, that the appropriate schema defines "at least a compression node, the compression node describing object data to be compressed, and parameters used for data compression," as recited in claim 1. Thus, Applicants assert that the approach described in Tabatabai is different from the approach recited in claim 1. Accordingly, for at least these reasons, Applicants respectfully submit that Tabatabai does not anticipate independent claim 1.

Similarly, claim 18 as amended recites, "an XML schema that defines a compression node comprising at least information regarding object data to be compressed and parameters used for data compression; style sheets which support conversion of an input XML file into a file which is to be input to a predetermined data compression encoder, based on the XML schema; and an XML parser which parses the input XML file based on the XML schema and the style sheets to generate the file which is to be input to a predetermined data compression encoder." For at least the same reasons described above with respect to claim 1, Applicants respectfully submit that Tabatabai does not anticipate independent claim 18.

Accordingly, Applicants respectfully request that the rejection of claim 1 and all claims depending therefrom (i.e., claim 16) and claim 18 under § 102(b) in light of Tabatabai be withdrawn.

Additionally, for at least the same reasons described above with respect to claim 1, Applicants respectfully submit that Tabatabai does not anticipate new claim 24, and all claims depending therefrom (i.e., claims 25-28). At a minimum, Tabatabai does not describe an XMT schema defining "a compression node which includes information regarding object data to be compressed, an encoding parameter required for data compression, objectDescriptorID which is the same as identification stored in a URL field of the compression node, and BitWrapperEncodingHints which specifies a name of a file storing a compressed bitstream to be transmitted and a format of the bitstream, the file being included in a mux file," as recited in claim 24.

#### **Claim Rejections Under 35 U.S.C. §103(a)**

Claims 2-15, 17, and 19-23 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tabatabai in view of "Study Text of ISO/IEC 14496-1:2001/FDAM2," MPEG-W Systems, pages 1-91 (March 2002) to Kim *et al.* ("Kim"). Applicants respectfully traverse this rejection for at least the following reasons.

For at least the same reasons described above with respect to claim 1, Applicants respectfully submit that claims 2-4, which depend from claim 1, are patentable over Tabatabai, and that Kim does not supply the missing teachings. Similarly, for at least the same reasons described above with respect to claim 18, Applicants respectfully submit that claim 19, which depends from claim 18, is patentable over Tabatabai, and that Kim does not supply the missing teachings. At a minimum, neither Tabatabai nor Kim appears to disclose an XML schema defining a

compression node that describes object data to be compressed and parameters used for data compression, as recited in independent claims 1 and 18.

Claim 5, as amended recites, among other features, "making an XMT schema which defines a compression node describing object data to be compressed, parameters for data compression, and BitWrapperEncodingHints which at least specifies a location of a file in which the object data to be compressed is stored; making an XMT2BIFS style sheet which supports conversion of an XMT input file into a scene file and an XMT2MUX style sheet which supports conversion of the XMT input file into a mux file, based on the XMT schema; and generating the scene file and the mux file by parsing the input XMT file using the XMT schema and the XMT2BIFS and XMT2MUX style sheets, respectively."

While Tabatabai describes organizing MPEG-4 audiovisual scenes, which are composed of media objects, into a hierarchical tree structure called a "scene graph," neither Tabatabai nor Kim describes the XMT2BIFS style sheet, which is a particular style sheet, and generating the scene file by parsing the input XMT file using the XMT schema and the XMT2BIFS style sheet. (See, Tabatabai at paragraphs [0009]–[0010]). Similarly, while Tabatabai describes an MPEG-7 Data Definition Language (DDL) that is based on XML schema and XML standards, neither Tabatabai nor Kim describes the XMT2MUX style sheet, which is a particular style sheet, and generating a mux file by parsing the input XMT file using the XMT schema and the XMT2MUX style sheet. (See, Tabatabai at paragraph [0012]). Accordingly, for at least these reasons, Applicants respectfully submit that claim 5 is patentable over Tabatabai in view of Kim.

Similarly, claim 20 as amended recites, among other features, "an XMT schema which defines a compression node specifying object data to be compressed, parameters for data compression, and BitWrapperEncodingHints which at least specifies a location of a file in which the object data to be compressed is stored; an XMT2BIFS style sheet which supports conversion of an input XMT file into a scene file based on the XMT schema; an XMT2MUX style sheet which supports conversion of the input XMT file into a mux file based on the XMT schema; and an XMT parser which parses the input XMT file based on the XMT schema and the XMT2BIFS and XMT2MUX style sheets to generate the scene and mux files, respectively, as the input files to a predetermined compression encoder." For at least the same reasons described above with respect to claim 5, Applicants respectfully submit that claim 20 is patentable over Tabatabai in view of Kim.

Accordingly, Applicants respectfully request that the rejection of claims 2-4, claim 5 and all claims depending therefrom (i.e., claims 6-15 and 17), claim 19, and claim 20 and all claims depending therefrom (i.e., claims 21-23) under § 103(a) over Tabatabai in view of Kim be withdrawn.

Additionally, for at least the same reasons described above with respect to claims 2-15, 17, and 19-23, Applicants respectfully submit that new claim 24, and all claims depending therefrom (i.e., claims 25-28), are patentable over Tabatabai in view of Kim. For example, claim 24 recites, among other features, "generating, based on the XMT schema, an XMT2BIFS style sheet which supports conversion of an input XMT file into a scene file and an XMT2MUX style sheet which supports conversion of the input XMT file into the mux file," and "making the scene file and the mux file by parsing the input XMT file according to the XMT schema, using the

XMT2BIFS style sheet and the XMT2MUX style sheet." At a minimum, neither Tabatabai nor Kim describes the XMT2BIFS and XMT2MUX style sheets, which are particular style sheets, and generating the scene and mux files using the XMT2BIFS and the XMT2MUX style sheets.

### **CONCLUSION**

Applicants have noted significant differences between the disclosures of Tabatabai and Kim and the present application and, as a result, have provided reasoned arguments as to why the elements of the claims of the present application are not disclosed by or rendered obvious thereby.

It is believed that this Response and Amendment is accompanied by the proper fee. However, if additional fees are required for any reason, please charge Deposit Account No. 02-4800 the necessary amount.

In the event that there are any questions concerning this paper, or the application in general, the Examiner is respectfully urged to telephone Applicants' undersigned representative so that prosecution of the application may be expedited.

Respectfully submitted,

BUCHANAN INGERSOLL PC

Date: June 8, 2006

By: Nicole D. Dretar  
Nicole D. Dretar  
Registration No. 54,076

P.O. Box 1404  
Alexandria, Virginia 22313-1404  
(703) 836-6620